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Attn: International Financial Reporting Standards (IFRS) Foundation / International Sustainability Standards Board (ISSB).

Sent via email: [commentletters@ifrs.org](mailto:commentletters@ifrs.org)

## WOODSIDE RESPONSE TO ISSB CONSULTATION

Woodside welcomes the ISSB consultation process and the intent to produce globally applicable sustainability reporting standards. We believe that, if properly implemented, there is the potential that both reporters and users of reports will benefit from harmonisation of standards and a common understanding of the key concepts, terms and the purposes for which disclosures can be relied upon.

In addition to this response, as a member company of the International Petroleum Industry Environmental Conservation Association (IPIECA) we also draw your attention to their submission.

We would like to raise the following feedback on the draft standards for consideration.

***Time to develop the standards.*** We note that the draft standards will apply across a diverse range of industries and cover complex and material data sets and information. Given this, we believe necessary time should be given to ensure an appropriate level of consolidation and alignment between existing and proposed relevant international and domestic reporting standards.

***Time to implement the standards.*** It is important that following the finalisation of the standards, a reasonable implementation period of at least three years is provided. This timing will allow for the relevant planning, approvals and release of additional expenditure required to address the reporting requirements. This will also allow reporters the time to establish the necessary “basis of preparation” for the gathering of data. This timing should also consider relevant phasing of assurance requirements, in particular the capacity of the assurance / audit industry to respond. We also suggest that the ISSB consider the establishment of a mandatory review of the standards, following an initial three-to-five-year period, to ensure they are generating the intended outcomes.

***Accurate description of data.*** Due consideration should also be given to data sets that are difficult to assure, audit and evidence (for example the measurement of Scope 3 emissions data in the instance where we sell an oil shipment to a trader and do not have line of sight to the end use), noting such information may be calculated from assumptions rather than directly measured. The nature of these disclosures should be made clear to users so they can calibrate their use of the data accordingly and are able to give appropriate weighting to certain data points. Consideration should be given to establishing an appropriate level of flexibility regarding the provision of information / data (e.g., estimates or averages may be utilised where data sets are not available).

**Consolidation of multiple standards and frameworks.** We note that entities subject to the new standards may also remain subject to separate / unchanged reporting requirements in various international jurisdictions. Also, they may voluntarily report in accordance with existing sustainability related frameworks. We further note that Environmental, Social and Governance (ESG) rating indices continue to look to broader sustainability reporting frameworks (GRI, SASB, TCFD etc.) for assessment of entities, this should also be considered in the application of the new standards.

For example, Woodside's 2021 Sustainable Development Report was prepared in accordance with the Global Reporting Initiative (GRI) Standards core option and with reference to the IPIECA, American Petroleum Institute (API) and International Association of Oil and Gas Producers (IOGP) (4th edition 2020) Sustainability Reporting Guidance for the oil and gas industry. Woodside's 2021 Climate Report was structured to align with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations framework and provide a balance of disclosures that reasonably meet the recommendations of the TCFD while avoiding overwhelming users with information. The 2021 Climate Report was also prepared with reference to selected relevant metrics from the Sustainable Accounting Standards Board (SASB) Oil and Gas Exploration and Production Standard. Woodside is a supporter of the TCFD.

We welcome the alignment of the proposed standards with TCFD and recommend a continued focus in this regard as the standards progress. We note however that the list of defined terms in the proposed standards is more limited than in the *Climate Related Disclosures Prototype. Appendix A.* published by the IFRS in November 2021. Whilst there may be a range of views, we believe that the definitions provided in the Prototype were useful.

In summary, we would like to reinforce that further consolidation work is required from a holistic perspective with regards to TCFD and SASB, as well as the consideration of broader sustainability frameworks including GRI, CDSB, VRF and other voluntary standards. The benefits of the ISSB's proposed standards will be eroded if reporters continue to be required (voluntarily or otherwise) to report to multiple standards.

We remain available to discuss our response and encourage the ongoing consultation process required to finalise the standards.

Yours faithfully



**Graham Tiver**  
Executive Vice President / Chief Financial Officer



**Tony Cudmore**  
Senior Vice President Strategy and Climate

Copy:

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